

YOUNG CONAWAY STARGATT & TAYLOR, LLP

BRUCE M. STARGATT
BEN T. CASTLE
SHELDON N. SANDLER
RICHARD A. LEVINE
RICHARD A. ZAPPA
FREDERICK W. JOBST
RICHARD H. MORSE
DAVID C. MCBRIDE
JOSEPH M. NICHOLSON
CRAIG A. KARSNITZ
BARRY M. WILLOUGHBY
JOSEPH W. INGERSOLL
ANTHONY G. FLYNN
JEROME K. GROSSMAN
EUGENE A. DIPRINZIO
JAMES L. PATTON, JR.
ROBERT L. THOMAS
WILLIAM D. JOHNSTON
TIMOTHY J. SNYDER
BRUCE L. SILVERSTEIN
WILLIAM W. BOWSER
LARRY J. TARABICOS
RICHARD A. DILIBERTO, JR.
MELANIE K. SHARP
CASSANDRA F. ROBERTS

RICHARD J.A. POPPER
TERESA A. CHEEK
NEILL MULLEN WALSH
JANET Z. CHARLTON
ROBERT S. BRADY
JOEL A. WAITE
BRENT C. SHAFFER
DANIEL P. JOHNSON
CRAIG D. GREAR
TIMOTHY JAY HOUSEAL
BRENDAN LINEHAN SHANNON
MARTIN S. LESSNER
PAULINE K. MORGAN
C. BARR FLINN
NATALIE WOLF
LISA B. GOODMAN
JOHN W. SHAW
JAMES P. HUGHES, JR.
EDWIN J. HARRON
MICHAEL R. NESTOR
MAUREEN D. LUKE
ROLIN P. BISSELL
SCOTT A. HOLT
JOHN T. DORSEY
M. BLAKE CLEARY

THE BRANDYWINE BUILDING
1000 WEST STREET, 17TH FLOOR
WILMINGTON, DELAWARE 19801

P.O. Box 391
WILMINGTON, DELAWARE 19899-0391

(302) 571-6600
(800) 253-2234 (DE ONLY)
FAX: (302) 571-1253

110 WEST PINE STREET
P.O. Box 594
GEORGETOWN, DELAWARE 19947
(302) 856-3571
(800) 255-2234 (DE ONLY)

FAX: (302) 856-9338

WWW.YOUNGCONAWAY.COM

DIRECT DIAL: 302-571-6651
DIRECT FAX: 302-576-3319
rmorse@ycst.com

ATHANASIOS E. AGELAKOPOULOS
JOSEPH M. BARRY
SEAN M. BEACH
DONALD J. BOWMAN, JR.
TIMOTHY P. CAIRNS
CURTIS J. CROWTHER
MARGARET M. DIBIANCA
ERIN EDWARDS
KENNETH J. ENOS
IAN S. FREDERICKS
JAMES J. GALLAGHER
DANIELLE GIBBS
SEAN T. GRECHER
KARA HAMMOND COYLE
STEPHANIE L. HANSEN
DAWN M. JONES
RICHARD S. JULIE
KAREN E. KELLER
JENNIFER M. KINKUS
EDWARD J. KOSMOWSKI
JOHN C. KUFFEL

SPECIAL COUNSEL
JOHN D. MCLAUGHLIN, JR.
ELENA C. NORMAN (NY ONLY)
PATRICIA A. WIDDOSS

TIMOTHY E. LENGKEEK
ANDREW A. LUNDGREN
MATTHEW B. LUNN
JOSEPH A. MALFITANO
ADRIA B. MARTINELLI
MICHAEL W. MCDERMOTT
MARIBETH L. MINELLA
EDMON L. MORTON
D. FON MUTTAMARA-WALKER
JENNIFER R. NOEL
JOHN J. PASCHETTO
ADAM W. POFF
SETH J. REIDENBERG
FRANCIS J. SCHANNE
MICHELE SHERRETTA
MICHAEL P. STAFFORD
JOHN E. TRACEY
MARGARET B. WHITEMAN
CHRISTIAN DOUGLAS WRIGHT
SHARON M. ZIEG

OF COUNSEL
STUART B. YOUNG
EDWARD B. MAXWELL, 2ND

September 26, 2005

BY E-FILE

The Honorable Gregory M. Sleet
844 N. King Street
Room 4209
Wilmington, DE 19801

Re: Rosenwald v. Unger et al., Civ. No. 05-692

Dear Judge Sleet:

We write on behalf of nominal defendant MBNA and defendant Bruce L. Hammonds to request an extension of defendants' time to answer, move or otherwise respond to the complaint in the above-captioned derivative action. This matter was transferred to this Court from the District of Maryland on September 19, 2005, after it was removed on August 19, 2005 from Maryland state court.

To the best of our knowledge, this case has not yet been formally assigned to any judge of this Court. Nevertheless, because this case is based on the same facts and allegations as other actions currently before this Court, we expect that this case ultimately will be assigned to Your Honor and consolidated with the two other closely related derivative actions pending before Your Honor, *Lemon Bay Partners LLP v. Hammonds*, No. 1:05-CV-00327-GMS (D. Del. Filed May 25, 2005), and *Benoit v. Hammonds*, No. 1:05-CV-00361-GMS (D. Del. filed June 6, 2005). This Court has extended defendants' time to answer, move or otherwise respond to the complaints in these other derivative actions until forty-five days following the filing of an amended complaint, which has not yet been filed.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

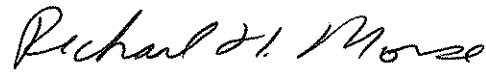
The Honorable Gregory M. Sleet

September 26, 2005

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The parties to this action do not intend this letter to alter the schedule of any related actions. Rather, after consulting with plaintiff's counsel and counsel for all other defendants, we hereby submit the attached [Proposed] Order to extend by 30 days defendants' time to answer or otherwise respond to plaintiff's complaint. After this case is formally assigned to this Court, the parties will negotiate and seek approval of a schedule that Your Honor deems appropriate in light of the aforementioned related actions.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Richard H. Morse". The signature is fluid and cursive, with the first name "Richard" and last name "Morse" clearly distinguishable.

Richard H. Morse (ID #531)

RHM:sm

Enclosure

cc: Clerk of the United States District Court
(by e-filing)
Irving Bizare, Esq.
(by e-mail)

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

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MALCOLM ROSENWALD,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
LAURA S. UNGER, BENJAMIN R.	:	
CIVILETTI, WILLIAM H. JEWS, JAMES	:	
H. BERICK, MARY H. BOIES, BRUCE L.	:	
HAMMONDS, RANDOLPH C. LERNER,	:	Civil Action No. 05-692
STUART L. MARKOWITZ, WILLIAM H.	:	
MILSTEAD and THOMAS G.	:	
MURDOUGH, JR.,	:	
	:	
Defendants,	:	
	:	
MBNA CORPORATION,	:	
	:	
Nominal Defendant.	:	
-----	X	

[PROPOSED] ORDER

WHEREAS, the parties have conferred and agreed to extend by 30 days defendants' time to answer, move or otherwise respond to plaintiff's complaint in the above-captioned action,

I HEREBY ORDER that defendants shall have 30 days from the entry of this order to answer, move or otherwise respond to plaintiff's complaint.

SO ORDERED,

Judge Gregory M. Sleet
United States District Judge